

1 GREY AND KOHLWECK
2 Attorneys at Law
3 1821 Wilshire Boulevard
4 Suite 210
5 Santa Monica, CA. 90403
6
7 (213) 820-4676

8 Attorneys for Plaintiff

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 FOR THE COUNTY OF LOS ANGELES

11 CHURCH OF SCIENTOLOGY OF)	CASE NO. C 420 153
12 CALIFORNIA, INC., a)	
13 California corporation,)	NOTICE OF DEPOSITION AND
14 Plaintiff,)	NOTICE TO PRODUCE BOOKS,
15 vs.)	DOCUMENTS AND OTHER TANGIBLE
16 GERALD ARMSTRONG, and)	THINGS AT DEPOSITION
17 DOES 1 through 10,)	
18 inclusive,)	
19 Defendants.)	

20 TO: DEFENDANT GERALD ARMSTRONG AND TO HIS ATTORNEY OF RECORD
21 HEREIN:

22 NOTICE IS HEREBY GIVEN that plaintiff, CHURCH OF
23 SCIENTOLOGY OF CALIFORNIA, INC., a California corporation (herein
24 after referred to as "plaintiff") will take the deposition on
25 oral examination of defendant GERALD ARMSTRONG (hereinafter
26 referred to as "defendant") on Wednesday, August 11, 1982 at
27 10:00 o'clock a.m. Said deposition shall be taken in the law
28 offices of Grey and Kohlweck, located at 1821 Wilshire Boulevard,
Suite #210, Santa Monica, California 90403.

1 Said deposition will be taken before a Notary Public
2 who is not a relative, employee, attorney or counsel of any of
3 the parties, nor a relative or employee of any such attorney or
4 counsel, nor a person financially interested in the within
5 action.

6 If said deposition is not completed on its respective
7 date, the taking thereof shall continue from day to day there-
8 after at the same time and place, Sundays and holidays excepted,
9 until completed.

10 NOTICE IS HEREBY FURTHER GIVEN that in addition to
11 attending at the time and place and on the date specified above,
12 defendant is requested, directed and required, pursuant to
13 California Code of Civil Procedure, Sections 2016 and 2019,
14 to then and there produce, for inspection, examination and
15 copying by plaintiff, the following books, documents and other
16 tangible things:

17 NOTES TO ITEMS REQUESTED

18 NOTE 1. Each and every reference to any party to
19 this action is intended, and shall be for all purposes deemed
20 and construed, to constitute a reference to the party named
21 and to each and all of his or its co-parties, assignors, attorneys
22 accountants, employees, agents and other representatives.

23 NOTE 2. The word "writing", wherever appearing in
24 any Note or Item herein, is intended, and shall be for all
25 purposes deemed and construed, to mean each and every writing
26 as said term is defined in and by California Evidence Code,
27 Section 250.

28 NOTE 3. The within Notice to Produce Books, Documents

1 and Other Tangible Things at Deposition, seeks, in the case of
2 each and every writing described or referred to herein, the
3 original thereof, unless the same does not repose in the
4 possession, custody or control of defendant and is not otherwise
5 available or accessible to him, in which case the within Notice
6 to Produce seeks the best, most true, most complete and most
7 legible copy thereof.

8 NOTE 4. The within Notice to Produce Books, Documents
9 and Other Tangible Things at Deposition seeks only the items
10 which both (1) are described or referred to herein and (2) pre-
11 sently repose in the possession, custody or control of, or are
12 otherwise available or accessible to defendant.

13 ITEMS REQUESTED

14 Any and all letters, memoranda, notes, records, diaries,
15 calendars, reports, papers, documents and other written matter,
16 and any drafts or revisions thereof relating to the subject
17 matter of this action, including, but not limited to, any
18 material obtained by defendant during his tenure as the custodian
19 of records for the Archives Project of the Church of Scientology
20 of California, including, by way of example and not limitation:
21 journals, memoranda, drafts, notes, orders, letters, HCOB's,
22 HCOPL's, any other form of policy or technical directives or
23 bulletins, photographs, audio and video-recordings of every
24 kind, artifacts, memorabilia, antique writings and treatises,
25 books, novels and other publications of L. Ron or Mary Sue
26 Hubbard, or any other material not above described but being

27 //

28 //

1 a part of the Archives collection.

2 DATED: August 4, 1982.

3
4 GREY AND KOHLWECK

5 By: Carl E. Kohlweck
6 Carl E. Kohlweck, Esq.
7 Attorneys for Plaintiff

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28